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14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 **UNITED STATES of AMERICA and THE**  
17 **STATE of CALIFORNIA, *ex rel.*,**  
18 **SHELBY EIDSON,**

19 *Plaintiffs,*

20 **vs.**

21 **AURORA LAS ENCINAS LLC, LINDA**  
22 **PARKS, SIGNATURE HEALTHCARE**  
23 **SERVICES LLC, AND DOES 1**  
24 **THROUGH 10, jointly and severally,**

25 *Defendants*

Case No.: 2:10-cv-1031 JAK (RZx)  
**FILED PROVISIONALLY UNDER**  
**SEAL**

**EX PARTE APPLICATION TO FILE  
UNDER SEAL: (1) RELATOR'S  
OPPOSITION TO DEFENDANT'S  
MOTION FOR SUMMARY  
JUDGEMENT; (2) RELATOR'S  
OBJECTIONS TO THE DECLARATION  
OF ALAN GHILCHRIST; (3)  
DECLARATION OF RICHARD DIAZ IN  
SUPPORT OF RELATOR'S  
OPPOSITION TO DEFENDANTS  
MOTION FOR SUMMARY JUDGMENT;  
(4) DECLARATION OF RICHARD DIAZ  
IN SUPPORT OF RELATOR'S  
OBJECTIONS TO THE DECLARATION  
OF ALAN GHILCHRIST; (5)  
DECLARATION OF SHLEBY EIDSON  
IN SUPPORT OF RELATOR'S  
OBJECTIONS TO THE DECLARATION  
OF ALAN GHILCHRIST; (6)  
STATEMENT OF GENUINE ISSUE**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Pursuant to Local Rule 79-5, Relator/Plaintiff Shelby Eidson, hereby requests that this Court issue an order sealing (1) Relator's Memorandum in Opposition to Defendant's Motion for Summary Judgment, (2) Relator's Objections to the Declaration of Alan G. Gilchrist, (3) Declaration of Richard Diaz in Support of Relator's Opposition to Defendant's Motion for Summary Judgment, (4) Declaration of Richard Diaz in Support of Relator's Objections to the Declaration of Alan Gilchrist, (5) Declaration of Shelby Eidson in Support of Relator's Objections to the Declaration of Alan G. Gilchrist, and (6) Relator's Statement of Genuine Issues. This application to file the above documents under seal is based upon the following facts:

1. As part of Relator's Memorandum in Opposition to Defendant's Motion for Summary Judgment, Relator's Objections to the Declaration of Alan G. Gilchrist, and Relator's Statement of Genuine Issues, Relator has referred to medical records, deposition testimony, and has attached as exhibits portions of the medical records as well as the transcripts of the deposition testimony in support of her motion.

2. This application is consistent with the Magistrate Judge Zarefsky's order that the patient information be filed under seal.

This application is brought pursuant to Local Rule 79-5.1 and is based on this application and proposed order filed concurrently with this application.

Dated: May 2, 2013

COLLEEN FLYNN  
MARK KLEIMAN  
DISABILITY RIGHTS LEGAL CENTER  
Attorneys for Plaintiff/Relator

By: /s/Richard Diaz  
Richard Diaz